

KC Garner #13936  
Brian Wurtz #11436  
Beehive Advocates  
10907 South State Street  
Sandy, Utah 84070  
Telephone: (801) 432-2975  
Facsimile: (801) 528-3092

Attorneys for Debtor

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**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF UTAH, CENTRAL DIVISION**

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In re:	Case No. 24-24828
SERAFIN V. ESQUIVEL	Chapter 13
Debtor.	Judge: JOEL T. MARKER
	Filed Electronically

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**NOTICE OF ADEQUATE PROTECTION PAYMENTS  
UNDER 11 U.S.C. § 1326(a) AND OPPORTUNITY TO OBJECT**

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The Debtor states as follows:

1. On September 23, 2024, the Debtor filed a Chapter 13 petition for relief.
2. The Debtor proposes to make Adequate Protection Payments, pursuant to § 1326(a)(1)(C) accruing with the initial plan payment which is due no later than the originally scheduled

meeting of creditors under § 341 and continuing to accrue on the first day of each month thereafter, to the holders of the allowed secured claims in the amounts specified below:

<b>Secured Creditor</b>	<b>Description of Collateral</b>	<b>Monthly Adequate Protection Payment Amount</b>	<b>Number of Months to Pay Adequate Protection</b>
Mountain America Credit Union	2016 Chevrolet Cruze	\$93.00	6

3. The monthly plan payments proposed by the Debtor shall include the amount necessary to pay all Adequate Protection Payments and the amount necessary to pay the Trustee's statutory fee.
4. Upon completion of the Adequate Protection Payment period designated herein for each listed secured creditor, the Equal Monthly Plan Payment identified in each Part of the Plan shall be the monthly payment and shall accrue on the first day of each month.
5. This Notice shall govern Adequate Protection Payments to each listed secured creditor unless subsequent Notice is filed by Debtor or otherwise ordered by the Court.
6. Objections, if any, to the proposed Adequate Protection

Payments shall be filed as objections to confirmation of the Plan. Objections must be filed and served no later than 7 days before the date set for the hearing on confirmation of the Plan.

Dated this 11th day of December 2024.

Beehive Advocates

/s/  
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Brian Wurtz  
Attorney for Debtor